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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RAMIRO JIMENEZ, JR, individually; JESUS
R. PEREZ, individually;

Plaintiffs,

v.

KEY INSURANCE COMPANY, a foreign
corporation; DOE DRIVER I-X; DOE OWNERS
I-X; ROE OWNERS I-X; ROE EMPLOYERS I-
X, and ROE COMPANIES I-X,

Defendants.

CASE NO.: 2:23-cv-01329-APG-BNW

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**
(First Request)

IT IS HEREBY STIPULATED AND AGREED TO by Plaintiffs RAMIRO JIMENEZ, JR. and JESUS R. PEREZ, by and through their counsel of record, KIMBALL JONES, ESQ., and JOSHUA P. BERRETT, ESQ., with the Law Offices of **BIGHORN LAW**, and Defendant KEY INSURANCE COMPANY by and through their counsel of record, PHILIP GOODHART, ESQ., with the Law Offices of **THORNDAL ARMSTRONG, PC**, pursuant to Fed. R. Civ. P. 6(b), LR IA 6-1, LR 26-1 and LR 26-3, that Discovery Deadlines be extended by an additional 30 days. This is the Parties' First Request for a continuance of the discovery deadlines.

A. DISCOVERY COMPLETED TO DATE

- a. On November 8, 2023, Plaintiff served its FRCP 26 Initial Disclosures;
- b. On December 15, 2023, Plaintiff Ramiro Jimenez, Jr. propounded his first set of Interrogatories to Defendant;

- c. On December 15, 2023, Plaintiff Ramiro Jimenez, Jr., propounded his first set of Requests for Production of Documents to Defendant;
- d. On January 3, 2024, Plaintiff sent a letter to Defendant requesting its FRCP 26 initial disclosures;
- e. On January 17, 2024, Defendant served its FRCP 26 Initial Disclosures;
- f. On February 6, 2024, Plaintiff sent a letter to Defendant requesting responses to its written discovery and pursuant to Rules 33 and 34 of FRCP any and all objections are now waived;
- g. On March 4, 2024, Plaintiff filed a Motion to Compel Discovery Responses;
- h. On March 5, 2024, Defendant served responses to First Set of Interrogatories (unverified) on Plaintiff;
- i. On March 5, 2024, Defendant served responses to First Set of Requests for Production of Documents on Plaintiff.

B. DISCOVERY THAT REMAINS TO BE COMPLETED.

The parties have agreed to a 30 day extension to complete the remaining discovery. The discovery that remains to be completed includes:

- a. Propound and respond to additional written discovery;
- b. Deposition of the Plaintiffs;
- c. Deposition of Key Insurance claims personnel and FRCP 30(b)(6) witnesses;
- d. Disclosure of Expert Witnesses and Reports;
- e. Depositions of Expert Witnesses;
- f. Follow-up discovery efforts as needed.

C. REASONS WHY THE PARTIES ARE REQUESTING EXTENSION/GOOD CAUSE.

Good cause exists for the extension of the current discovery deadlines as the Parties require additional time to complete the remaining necessary discovery, and the parties can demonstrate excusable neglect justifying the filing of this stipulation less than 20 days prior to the current expert disclosure deadline. Defendant's counsel had a loss in his family, which delayed responding to discovery, not leaving sufficient time to analyze the information before the current disclosure deadlines.

As the current Expert Disclosure deadline is set for March 25, 2024, an extension of 30 days will

afford the Parties time to complete written discovery, assess any and all new documents, and take any depositions before expert reports are exchanged. All parties believe that the Court's granting of this stipulation would further the interests of justice and advance the merits of the case. As such, good cause exists for extending discovery. This request is made for dilatory purposes.

D. PROPOSED REVISED DISCOVERY SCHEDULE.

	CURRENT DEADLINE	PROPOSED DEADLINE
Initial Expert Disclosures	March 25, 2024	April 24, 2024
Rebuttal Expert Disclosures	April 24, 2024	May 24, 2024
Discovery Cut-Off	May 24, 2024	June 24, 2024
Dispositive Motions	June 24, 2024	July 24, 2024
Pre-Trial Order	July 24, 2024	August 23, 2024*

*In the event that dispositive motions are filed, the date for filing the joint pretrial order will be suspended until thirty (30) days after decision of the dispositive motions or further order of the Court.

IT IS SO STIPULATED.

DATED this 15th day of March 2024.

BIGHORN LAW

/s/Joshua P. Berrett

JOSHUA P. BERRETT, ESQ.

Nevada Bar No. 12697

3675 W. Cheyenne Avenue, Suite 100
N. Las Vegas, Nevada 89032

Attorneys for Plaintiffs

THORNDAL ARMSTRONG, PC.

/s/Philip Goodhart

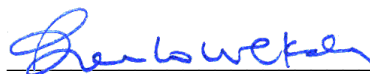
PHILIP GOODHART, ESQ.

Nevada Bar No. 5334

600 S. Las Vegas Blvd., Suite 400
Las Vegas, Nevada 89101

Attorneys for Defendant

IT IS SO ORDERED.



U.S. MAGISTRATE JUDGE

Dated: 3/18/2024



Sandy L. Jackson <sandyj@bighornlaw.com>

Ramiro Jimenez, Jr./Jesus Perez v Key Insurance Company

2 messages

Sandy L. Jackson <sandyj@bighornlaw.com>

Thu, Mar 14, 2024 at 4:30 PM

To: Philip Goodhart <png@thorndal.com>, KMB@thorndal.com

Cc: "Joshua P. Berrett, Esq." <josh@bighornlaw.com>

Good Afternoon,

Attached please find the proposed Stipulation and Order to Extend Discovery Deadlines (First Request). Please let me know if we can affix your e-signature and submit it to the Court. Please let me know if you have any questions.

Thank you.

**BIGHORN
LAW****Sandy L. Jackson**
Litigation Manager

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**Jimenez-Perez-Stipulation and Order to Extend Discovery Deadlines 1st Request.pdf**
129K**Philip Goodhart** <png@thorndal.com>

Fri, Mar 15, 2024 at 9:07 AM

To: "Sandy L. Jackson" <sandyj@bighornlaw.com>, "Karen M. Berk" <KMB@thorndal.com>

Cc: "Joshua P. Berrett, Esq." <josh@bighornlaw.com>

Thanks Sandy

You can affix my electronic signature.

Philip Goodhart | Shareholder | Thorndal Armstrong, PC

PLEASE NOTE OUR NEW ADDRESS:**600 S. Las Vegas Boulevard, Suite 400****Las Vegas, NV 89101**